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In The United States District Court for the
Northern District of Illinois

FILED

NOV 14 2023 SK

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Christopher Wheeler

Plaintiff

V.

Officer Jordan Lyles

Defendant

Case # 22 cv 3020

Judge Lindsay Jenkins

Plaintiff's Request for Security
Accommodations by Cook County Department
of Corrections (CCDC)

Now Comes Plaintiff Christopher Wheeler, by
and through his own resources, to bring this Pro Se
request for an order to CCDC to accommodate a
Pro Se Plaintiff, for the following reasons:

1. Because Plaintiff is Pro Se, any and all notes, deadlines,
and other request by the defense or court must be documented
and managed by himself.

2. On or about 10/ / 2023, an attorney for defendant
attempted to visit Plaintiff via Zoom at CCDC.

3. Officer Griffin was responsible for attorney Zoom

calls on or about 10/27/2023 at CCDOC-Division of where Plaintiff is currently housed.

4. Officer Griffin insisted Plaintiff be handcuffed to the back during the Zoom call. This denied him the ability to take and access notes regarding the case.

5. Plaintiff made Officer Griffin aware that he is currently Pro Se and must have access to his hands. Officer Griffin said that wasn't his problem.

6. Plaintiff asked that the matter be escalated to a Supervisor. Officer Griffin refused to honor his request.

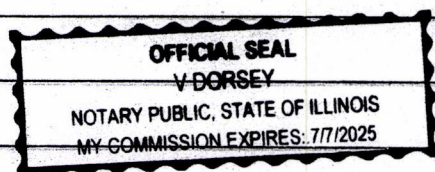
7. Defense Counsel did not help the situation by telling Officer Griffin that he did not see the need for Plaintiff to have access to his notes or write anything since they were "just going over the timeline". Plaintiff still cannot understand why such an important matter shouldn't be notated by himself.

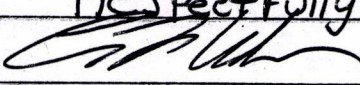
8. Plaintiff was forced to deny the visit with Opposing Counsel, wasting valuable time of all parties.

Conclusion

After Plaintiff discussed this issue with multiple Supervisors and consulted the CCDC Inmate Handbook, it was made known that CCDC does not have a mandatory Policy stating that inmates must be handcuffed behind their back unless in transit. This is left to the discretion of the Officer. Given the nature of this case, there can be a motive behind Officer Griffin's actions and without intervention from this court this problem will likely continue.

Therefore, Plaintiff Christopher Wheeler request that this honorable court issue an order to CCDC to allow Plaintiff access to his documents (with either NO CUFFS OR front facing cuffs) during any and all communication related to this case including any attorney visits (in-person and Zoom), any court video OR phone calls, or during calls or visits with Plaintiff Counsel (if/when obtained).



Respectfully Submitted,

 11/7/23
 Christopher Wheeler
 Plaintiff, Acting Prose



COOK COUNTY SHERIFF'S OFFICE

(Oficina del Alguacil del Condado de Cook)

INDIVIDUAL IN CUSTODY GRIEVANCE FORM

(Formulario de Queja del Individuo bajo Custodia)

CONTROL #

Individual In Custody SHORT #

! THIS SECTION IS TO BE COMPLETED BY IIC SERVICES STAFF

(! Para ser llenado solo por el personal de IIC Services !)

- ☐ Emergency Grievance
☐ Grievance
☐ Non-Compliant Grievance

- ☐ Cermak Health Services
☐ Superintendent: _____
☐ Other: _____

PRINT - INDIVIDUAL IN CUSTODY LAST NAME (Imprimir - Apellido del individuo):

PRINT - FIRST NAME (Imprimir - Primer nombre del individuo):

BOOKING NUMBER (# de identificación):

DIVISION (División):

LIVING UNIT (Unidad):

DATE (Fecha):

GRIEVANCE GUIDELINES AND SUMMARY OF COMPLAINT

To ensure CCDOC receipt of your grievance, please follow the submission requirement per the IIC Information Handbook or see a CRW (Correctional Rehabilitation Worker) for assistance.

Your grievance must meet all criteria listed below in order to be assigned a control #, to be appealed and/or to exhaust remedies.

The grievance issue is not one of the following non-grievable matters: Classification, including designation of an individual as a security risk or a protective custody individual, or decisions of the disciplinary hearings officer.

The grievance issue must have occurred within the last 15 calendar days unless the allegation is of sexual assault, sexual harassment, sexual abuse or voyeurism. If the grievance includes an allegation of sexual assault, sexual harassment, sexual abuse or voyeurism no time limits exist. If you believe an exception applies please see a CRW. The grievance issue must not be a repeat submission of a grievance collected within the last 15 calendar days.

The grievance issue must not be a repeat submission of a grievance that previously received a response and was appealed.

The grievance issue must not be a repeat submission of a grievance that previously received a response and you chose not to appeal the response within 15 calendar days.

The grievance issue must not contain offensive or harassing language and must not contain more than one issue.

The grievance issue must not pertain to non-jail related concerns such as with arresting agencies, judicial matters, or medical staff at outlying hospitals, etc.

Directrices de quejas y resumen de quejas

Para asegurarse de que CCDOC reciba su queja, siga el requisito de presentación según el Manual de Información de IIC o consulte a un CRW (trabajador de rehabilitación correccional) para obtener ayuda.

El asunto de la queja tiene que satisfacer todo el criterio listado más abajo para obtener un número de control, para ser apelado y/o agotar todos los remedios posibles.

El asunto de la queja no puede ser ninguno de los siguientes temas, que no se consideran quejas formales: Clasificación del preso incluyendo designación del preso. Tal como riesgo de seguridad o custodia de protección para los presos, o decisiones del oficial de audiencias disciplinarias para los individuos.

El asunto de la queja debe haber ocurrido dentro de los 15 días calendarios a menos que la acusación sea de asalto sexual, acoso sexual, abuso sexual o voyeurismo. Si la queja incluye acusaciones de asalto sexual, acoso sexual, abuso sexual o voyeurismo no existe tiempo de límite. Si usted cree que existe una excepción, consulte con un Trabajador de Rehabilitación Correccional (TRC/CRW).

El asunto de la queja no puede ser una repetición de una queja sometida en los últimos 15 días calendarios.

El asunto de la queja no puede ser una repetición de una queja previamente recibida y la cual ya ha recibido una respuesta y fue apelada.

El asunto de la queja no puede ser una repetición de una queja previamente recibida y la cual ya ha recibido una respuesta y usted recibida no someter una apelación sobre la decisión dada en los 15 días calendarios.

El tema agravado no debe contener lenguaje ofensivo o acosador y no debe contener más de un tema.

El asunto de la queja corresponde asuntos no relacionados con la cárcel, como las agencias de arresto, los asuntos judiciales o el personal médico en los hospitales periféricos, etc.

REQUIRED -
DATE OF INCIDENT
(Fecha del Incidente)REQUIRED -
TIME OF INCIDENT
(Hora del Incidente)REQUIRED -
SPECIFIC LOCATION OF INCIDENT
(Lugar Específico del Incidente)REQUIRED -
NAME and/or IDENTIFIER(S) OF ACCUSED
(Nombre y/o identificación del Acusado)

10/27/23

10:15 AM

Div. 08 3rd FIR
Living (Unidad)

OFC. Griffin

I am a prison IIC. In order to properly work on my case I must have access to my notes and the ability to take additional notes during visits. This is a right given to me by the U.S. Constitution. By Refusing to accommodate me (Ch refused to turn me to the front) This right has been violated. My criminal attorney (APD Robert Fox) has even been here to address this issue before. This is a pre-trial detention facility where I'm to fight my case(s) before trial. This grievance is a letter explaining the situation will be going to district court Judge Jenkins so she understand the delay and how CCDOC is going to sabotage a case involving their officer.

NAME OF STAFF OR INDIVIDUAL IN CUSTODY HAVING INFORMATION REGARDING THIS COMPLAINT:
(Nombre del personal o individuo que tengan información:)

SIGNATURE of Individual in Custody: (Individuo bajo custodia):

SUPERINTENDENT/DIRECTOR/DESIGNEE OF A DIVISION/UNIT MUST REVIEW ALL GRIEVANCES ALLEGING STAFF USE OF FORCE, STAFF MISCONDUCT, AND EMERGENCY GRIEVANCES. IF THE IIC GRIEVANCE IS OF A SERIOUS NATURE, THE SUPERINTENDENT MUST INITIATE IMMEDIATE ACTION.

CRW NAME (Print):

SIGNATURE:

DATE CRW RECEIVED:

CRW NOTATION OF SENT EMAIL (Print):

DATE EMAIL NOTIFICATION SENT:

ATTACHMENT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Christopher Wheeler,)	
)	
Plaintiff,)	Case No. 22-cv-3020
)	
v.)	Honorable Lindsay C. Jenkins
)	
Officer Jordan Lyles,)	
)	
Defendants.)	

**ACKNOWLEDGMENT
AND
AGREEMENT TO BE BOUND**

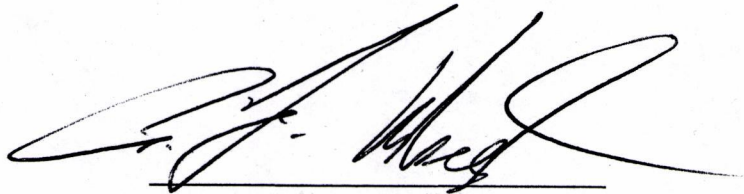
The undersigned hereby acknowledges that he/she has read the Confidentiality Order dated 10/19/2023 in the above-captioned action and attached hereto, understands the terms thereof, and agrees to be bound by its terms. The undersigned submits to the jurisdiction of the United States District Court for the Northern District of Illinois in matters relating to the Confidentiality Order and understands that the terms of the Confidentiality Order obligate him/her to use materials designated as Confidential Information in accordance with the Order solely for the purposes of the above-captioned action, and not to disclose any such Confidential Information to any other person, firm, or concern.

The undersigned acknowledges that violation of the Confidentiality Order may result in penalties for contempt of court.

Name: Christopher Wheeler
Job Title: N/A
Employer: N/A

CU
~~Business~~ Address: 2700 S. California Ave
Chicago, IL, 60608
IDA# 20170330/35

Date: 11-1-23

A handwritten signature in black ink, appearing to read "G. J. Macg", written over a horizontal line.

Signature